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June 12, 2015

**Via ECF and Facsimile (212-805-6737)**

The Honorable George B. Daniels  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re: SEC v. Gibraltar Global Securities, Inc., et al., 13 CV 2575 (GBD) (JCF)**  
**SEC v. Carrillo Huettel LLP, et al., 13 CV 1735 (GBD) (JCF)**

Dear Judge Daniels:

We write in further support of our application to withdraw as counsel in these two matters.

We are attaching the supplemental affidavit of Warren Davis in support of our application. In this affidavit, Davis consents to accept service of process via email. He has provided an email address and, under separate cover to the SEC, provided his cell phone number. His home phone number and home address are matters of record with the Securities Commission of the Bahamas.

As to Gibraltar Global Securities, Inc., the corporate defendant, the SEC has consistently taken the position that the company remains under the control of Davis, its sole shareholder and a director. Magistrate Judge Francis ruled in the SEC's favor on this issue and Davis has not appealed this ruling.

Both defendants have concededly and unfortunately failed to produce court-ordered discovery. Davis has indicated emphatically that he does not wish to defend these cases and instructed us to withdraw as counsel.

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We understand that the SEC may continue to oppose our application to withdraw. We assure the Court that we have attempted in good faith to resolve issues raised by the agency.

Mr. Davis does not want us to perform additional services on his behalf. He has provided the enclosed affidavit to address a principal concern raised by SEC with respect to our withdrawal.

Under the circumstances, with due respect to the Court and the SEC, we do not plan to respond to anticipated future applications by the SEC regarding relief sought against Davis or Gibraltar, as we do not believe we have the authority to do so. We believe such applications should be served on Davis in the manner indicated and/or, at the SEC's discretion, other available means.

Accordingly, for the foregoing reasons and those previously discussed, we respectfully request that the Court grant our application to withdraw as counsel.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Nick De Feis", written in a cursive style.

Nicholas M. De Feis (ND-1325)

Enclosure

cc (via ECF): All parties